

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation*

**Master File No. 1:00 – 1898
MDL 1358 (SAS)
M21-88**

This Document Relates To:

*Commonwealth of Pennsylvania, et al. v.
Exxon Mobil Corp., et al.*, No. 1:14-CV-06228-SAS

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Ellen L. Pierce, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendants LUKOIL Americas Corporation, LUKOIL North America LLC, LUKOIL Pan Americas LLC, and PJSC LUKOIL in the above-captioned action. I am in good standing of the bar of the Supreme Court of Pennsylvania and there are no pending disciplinary proceedings against me in any state or federal court, as evidenced by the Certificate of Good Standing annexed hereto. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

Dated: February 11, 2021

AKIN GUMP STRAUSS HAUER & FELD, LLP

/s/ Ellen L. Pierce

Ellen L. Pierce

Two Commerce Square

2001 Market Street, Suite

4100 Philadelphia, PA

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*Counsel for Defendants LUKOIL Americas
Corporation, LUKOIL North America LLC,
LUKOIL Pan Americas LLC, and PJSC LUKOIL*

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DECLARATION OF ELLEN L. PIERCE

Pursuant to 28 U.S.C. § 1746, I Ellen L. Pierce, declare and state the following:

1. I am an attorney with the law firm of Akin Gump Strauss Hauer & Feld, LLP, counsel for Defendants LUKOIL Americas Corporation, LUKOIL North America LLC, LUKOIL Pan Americas LLC, and PJSC LUKOIL in this action. I provide this declaration in support of my Motion for Admission *Pro Hac Vice*.

2. Unless otherwise indicated below, the matters set forth in this declaration are based on my personal knowledge and, if called as a witness, I could and would testify competently thereto.

3. My contact information is as follows:

Ellen L. Pierce
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Two Commerce Square
2001 Market Street, Suite
4100 Philadelphia, PA
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(215) 965-1210
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4. I am in good standing of the bar of the Supreme Court of Pennsylvania and there are no pending disciplinary proceedings against me in any state or federal court, as evidenced by the Certificate of Good Standing annexed hereto. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

I declare under the penalty of perjury that to the best of my knowledge the foregoing statements are true and correct.

Executed on: February 11, 2021
New York, New York

/s/ Ellen L. Pierce
Ellen L. Pierce

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ORDER FOR ADMISSION PRO HAC VICE

The Motion of Ellen L. Pierce for admission to practice *Pro Hac Vice* in the above-captioned action is granted. Applicant has declared that she is a member in good standing of the bar of the Supreme Court of Pennsylvania; and that her contact information is as follows:

Ellen L. Pierce
AKIN GUMP STRAUSS HAUER & FELD LLP
Two Commerce Square
2001 Market Street, Suite
4100 Philadelphia, PA
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Applicant having requested admission *Pro Hac Vice* to appear for all purposes as counsel for LUKOIL Americas Corporation, LUKOIL North America LLC, LUKOIL Pan Americas LLC, and PJSC LUKOIL in the above-entitled action;

IT IS HEREBY ORDERED that the Applicant is admitted to practice *Pro Hac Vice* in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court,

including the Rules governing discipline of attorneys.

Dated: _____
New York, New York

United States District Judge